

State of Colorado  
Energy & Carbon Management Commission

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Document Number:  
404588642  
Receive Date:  
03/24/2026  
Report taken by:  
RICK ALLISON

Site Investigation and Remediation Workplan (Supplemental Form)

This form shall be submitted to the Director for approval prior to the initiation of site investigation and remediation activities. However, this shall not preclude the Operator from taking immediate action to protect public health or safety, the environment, wildlife, or livestock.

This Form 27 describes site conditions as currently understood by the Operator; approval of this Form 27 by ECMC is based on the site conditions accurately described herein; any changes in site conditions identified during or subsequent to the performance of the approved workplan may necessitate additional investigation or remediation which shall be described on a supplemental Form 27. This Form 27 is intended to provide basic information regarding the proposed site investigation and remediation actions, but the workplan may be more fully described in attached documentation.

Closure request is not available for an Initial Site Investigation and Remediation Workplan.

OPERATOR INFORMATION

Name of Operator: <u>NOBLE ENERGY INC</u>	Operator No: <u>100322</u>	Phone Numbers Phone: <u>(970) 304-5000</u> Mobile: <u>( )</u>
Address: <u>1099 18TH STREET SUITE 1500</u>		
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80202</u>
Contact Person: <u>Dan Peterson</u>	Email: <u>RBUEUF27@chevron.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 35676 Initial Form 27 Document #: 403791885

PURPOSE INFORMATION

- Rule 913.c.(1): Pit or Cuttings Trench closure.
- Rule 913.c.(2): Buried or partially buried vessel closure, which will be by removal.
- Rule 913.c.(3): Remediation of Spill and Releases pursuant to Rule 912.
- Rule 913.c.(4): Land treatment of Oily Waste pursuant to Rule 905.e.
- Rule 913.c.(5): Closure of Centralized E&P Waste Management Facilities pursuant to Rule 907.h.
- Rule 913.c.(6): Remediation of impacted Groundwater pursuant to Rule 915.e.(3).D, and the contaminant concentrations in Table 915-1.
- Rule 913.c.(7): Investigation and remediation of natural gas in soil or Groundwater.
- Rule 913.c.(8): When requested by the Director due to any potential risk to soil, Groundwater, or surface water.
- Rule 913.c.(9): Decommissioning of Oil and Gas Facilities.
- Rule 913.g: Changes of Operator.
- Rule 915.b: Request to leave elevated inorganics in situ.
- Other: \_\_\_\_\_

SITE INFORMATION

Yes  Multiple Facilities

Facility Type: <u>LOCATION</u>	Facility ID: <u>310216</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>DILLARD - USX AB-67N64W 3SWSW</u>	Latitude: <u>40.596226</u>	Longitude: <u>-104.542404</u>	
	** correct Lat/Long if needed: Latitude: <u>40.595248</u>	Longitude: <u>-104.544223</u>	
QtrQtr: <u>SWSW</u>	Sec: <u>3</u>	Twp: <u>7N</u>	Range: <u>64W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>489305</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Dillard USX AB-67N64W 3SWSW</u>	Latitude: <u>40.595245</u>	Longitude: <u>-104.544505</u>	
	** correct Lat/Long if needed: Latitude: _____	Longitude: _____	
QtrQtr: <u>SWSW</u>	Sec: <u>3</u>	Twp: <u>7N</u>	Range: <u>64W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

## SITE CONDITIONS

General soil type - USCS Classifications SW \_\_\_\_\_

Most Sensitive Adjacent Land Use Grassland \_\_\_\_\_

Is domestic water well within 1/4 mile? Yes \_\_\_\_\_

Is surface water within 1/4 mile? Yes \_\_\_\_\_

Is groundwater less than 20 feet below ground surface? No \_\_\_\_\_

### **Other Potential Receptors within 1/4 mile**

Within Pronghorn Winter Concentration Area HPH  
Freshwater Emergent Wetland 0.12mi NE, 0.17mi NW, 0.22mi W

# SITE INVESTIGATION PLAN

## TYPE OF WASTE:

- |  |  |  |
|--|--|--|
| <input checked="" type="checkbox"/> E&P Waste      | <input type="checkbox"/> Other E&P Waste             | <input type="checkbox"/> Non-E&P Waste |
| <input checked="" type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids             | _____                                  |
| <input checked="" type="checkbox"/> Oil            | <input type="checkbox"/> Tank Bottoms                |  |
| <input checked="" type="checkbox"/> Condensate     | <input type="checkbox"/> Pigging Waste               |  |
| <input type="checkbox"/> Drilling Fluids           | <input type="checkbox"/> Rig Wash                    |  |
| <input type="checkbox"/> Drill Cuttings            | <input type="checkbox"/> Spent Filters               |  |
|  | <input type="checkbox"/> Pit Bottoms                 |  |
|  | <input type="checkbox"/> Other (as described by EPA) | _____                                  |

## DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
UNDETERMINED	GROUNDWATER	NA	Lab Analysis and Field Screening, if encountered
Yes	SOILS	Refer to Tables and Figures	Lab Analysis and Field Screening

## INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

Pursuant to ECMC Rule 911, a site investigation was conducted pertaining to the Dillard - USX AB-67N64W 3SWSW Facility. The tank battery was decommissioned on 12/11/24: Laboratory soil samples were collected from the partially-buried produced water vessel (PWV) excavation base (PVW01-B and PVW02-B), beneath the above-ground storage tanks (AST01, AST02), and beneath the separator risers for the dumpline and flowline (SEP01-DL, SEP01-FL). Samples were field screened at the N-W-S-E sidewalls of the PWV excavation, and highest field-screening result samples (PVW01-N, PVW02-S) were lab-submitted. Samples were also field-screened at the emission control device (FLARE01), and in the vicinity of infrastructure removed prior to decommissioning (GS01).

Initial laboratory analytical results indicated that benzo(a)anthracene was detected in excess of ECMC Table 915-1 regulation in sample location AST02; this detection was reported as a historic release (Form 19 Document # 404088158). As documented in the COA on Form 27 # 404087667, the initial decommissioning samples were analyzed outside of the specified hold times for EPA Method 8260 per SW-846 (VOCs & GRO) and EPA Method 9045D (pH).

## PROPOSED SAMPLING PLAN

### Proposed Soil Sampling

Will soil samples be collected as part of this investigation? ( Number, type (grab/composite), analyses, and locations of samples ):

Soil samples were collected as described in the Initial Action Summary of this Form 27. Soil samples were analyzed by a certified laboratory, using approved ECMC laboratory analysis methods, for the full extent of Table 915-1, including but not limited to: TPH (total volatile [C6-C10] and extractable [C10-C36] hydrocarbons), organic compounds in soil per ECMC Table 915-1, EC, SAR, pH, metals, and boron. All samples collected were analyzed by a certified laboratory using approved ECMC laboratory analysis methods.

### Proposed Groundwater Sampling

Will groundwater samples be collected as part of this investigation? ( Number, analyses, and locations of samples ):

If groundwater is encountered during the remedial excavation, a groundwater sample will be collected and analyzed for all organic and inorganic compounds per ECMC Table 915-1. This sample analysis includes, but is not limited to: BTEX, naphthalene, 1,2,4-trimethylbenzene (TMB), and 1,3,5-TMB by EPA Method 8260; chloride and sulfate anions by EPA Method 300.0; and total dissolved solids (TDS) by Method SM 2540C.

### Proposed Surface Water Sampling

Will surface water samples be collected as part of this investigation? ( Number, analyses, and locations of samples ):

## Additional Investigative Actions

Additional alternative investigative actions described in attached Site Investigation Plan ( summary ):

During decommissioning activities, field personnel screened disturbed areas using visual and olfactory senses to determine if laboratory confirmation sampling was required. Confirmation soil samples submitted for laboratory analysis were analyzed for full ECMC Table 915-1 constituents. A detailed summary of the tank battery decommissioning activities, including field notes, site photos, figures, and laboratory analytical results, is attached to Form 27 # 404087667.

# SITE INVESTIGATION REPORT

## SAMPLE SUMMARY

### Soil

Number of soil samples collected 10

Number of soil samples exceeding 915-1 0

Was the areal and vertical extent of soil contamination delineated? No

Approximate areal extent (square feet) 0

### NA / ND

           Highest concentration of TPH (mg/kg)           

           Highest concentration of SAR           

BTEX > 915-1 No

Vertical Extent > 915-1 (in feet) 4

### Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? Yes

Depth to groundwater (below ground surface, in feet)           

Number of groundwater monitoring wells installed           

Number of groundwater samples exceeding 915-1           

           Highest concentration of Benzene (µg/l)           

           Highest concentration of Toluene (µg/l)           

           Highest concentration of Ethylbenzene (µg/l)           

           Highest concentration of Xylene (µg/l)           

           Highest concentration of Methane (mg/l)           

### Surface Water

0 Number of surface water samples collected

           Number of surface water samples exceeding 915-1

If surface water is impacted, other agency notification may be required.

## OTHER INVESTIGATION INFORMATION

Were impacts to adjacent property or offsite impacts identified?

Were background samples collected as part of this site investigation?

On 12/12/24 and 10/14/25, 16 background soil samples were collected from BKG01-BKG07 near the tank battery and analyzed for Table 915-1 metals, pH, SAR, EC, and boron. Backgrounds were collected from depths ranging between 0' - 4' feet below ground surface, and the lithology was noted to be similar to that observed in site samples. The maximum background concentrations with a 1.25x multiplier applied for arsenic, barium, and selenium were calculated to be 23.5 mg/kg, 679 mg/kg, and 1.38 mg/kg, respectively. All arsenic, barium, and selenium concentrations observed during decommissioning were below background levels. Following a review of the analytical results, it was discovered that pH (EPA Method 9045D) was analyzed outside of the allotted hold times. Therefore, the background concentrations of pH from samples collected from BKG01 & BKG02 are invalid and will not be used for any future comparisons to site samples.

Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards)           

Volume of liquid waste (barrels)           

Is further site investigation required?

A site investigation was conducted on 04/13/26 to recollect soil samples analyzed outside of allotted holding times due to delays at Summit Scientific Laboratory. A total of 8 soil samples were collected and submitted for all Table 915-1 contaminants. The corresponding laboratory analytical report was received on 04/24/26; Operator is requesting an additional quarter to summarize the analytical results and propose additional site actions, as necessary. The 2Q26 site investigation will be summarized in the subsequent Form 27, and the ECOMC will be updated with any changes to the implementation schedule.

## REMEDIAL ACTION PLAN

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? No

## SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

The benzo(a)anthracene exceedance observed at sample location AST02@0-6" will be removed through remedial excavation. The excavation will be sampled per ECOMC guidance, and excavation confirmation samples will be analyzed for all Table 915-1 constituents. The results of the excavation will be submitted on a subsequent Form 27.

## REMEDICATION SUMMARY

Describe how remediation of existing impacts to soil and groundwater is to be accomplished (i.e. summarize remedial action plan). Provide a brief narrative description including: technical justification, schedule for implementation, estimated time to attain NFA status, plus plans and specifications for the selected remedial action technology.

A site investigation was conducted on 10/14/25 to delineate impacted media. 5 soil borings BH01-BH05 were advanced proximal to sample location AST02@0-6" to vertically and laterally delineate impacts. Soil samples were collected and analyzed for all Table 915-1 constituents. Analytical results from the 4Q25 site investigation indicate that impacts at AST02@0-6" are fully delineated, and Table 915-1 organic compound concentrations were within regulatory standards for all soil delineation samples collected. Groundwater was not encountered during this assessment.

A site investigation was conducted on 04/13/26 to recollect soil samples analyzed outside of allotted holding times due to delays at Summit Scientific Laboratory. A total of 8 soil samples were collected and submitted for all Table 915-1 contaminants. The corresponding laboratory analytical report was received on 04/24/26; Operator is requesting an additional quarter to summarize the analytical results and propose additional site actions, as necessary. The 2Q26 site investigation will be summarized in the subsequent Form 27, and the ECMC will be updated with any changes to the implementation schedule.

**Soil Remediation Summary**

In Situ

Ex Situ

- \_\_\_\_\_ Bioremediation ( or enhanced bioremediation )
- \_\_\_\_\_ Chemical oxidation
- \_\_\_\_\_ Air sparge / Soil vapor extraction
- \_\_\_\_\_ Natural Attenuation
- \_\_\_\_\_ Other \_\_\_\_\_

- \_\_\_\_\_ Excavate and offsite disposal
- \_\_\_\_\_ If Yes: Estimated Volume (Cubic Yards) \_\_\_\_\_
- \_\_\_\_\_ Name of Licensed Disposal Facility or ECMC Facility ID # \_\_\_\_\_
- \_\_\_\_\_ Excavate and onsite remediation
- \_\_\_\_\_ Land Treatment
- \_\_\_\_\_ Bioremediation (or enhanced bioremediation)
- \_\_\_\_\_ Chemical oxidation
- \_\_\_\_\_ Other \_\_\_\_\_

**Groundwater Remediation Summary**

- \_\_\_\_\_ Bioremediation ( or enhanced bioremediation )
- \_\_\_\_\_ Chemical oxidation
- \_\_\_\_\_ Air sparge / Soil vapor extraction
- \_\_\_\_\_ Natural Attenuation
- \_\_\_\_\_ Other \_\_\_\_\_

**GROUNDWATER MONITORING**

If groundwater has been impacted, describe proposed monitoring plan, including # of wells or sample points, monitoring schedule, analytical methods, points of compliance. Attach a groundwater monitoring location diagram.

Groundwater was not encountered during the initial decommissioning or site investigation activities to date.

# REMEDATION PROGRESS UPDATE

## PERIODIC REPORTING

### Approved Reporting Schedule:

Quarterly     Semi-Annually     Annually     Other

### Request Alternative Reporting Schedule:

Semi-Annually     Annually     Other

Rule 913.e:

After initial approval of a Form 27, the Operator will provide quarterly update reports in a Supplemental Form 27 to document progress of site investigation and remediation, unless an alternative reporting schedule has been requested by the Operator and approved by the Director. The Director may request a more frequent reporting schedule based on site-specific conditions.

**Report Type:**     Groundwater Monitoring     Land Treatment Progress Report     O&M Report  
 Other Timeline Update

## Adequacy of Operator's General Liability Insurance and Financial Assurance

Describe the adequacy of the Operator's general liability insurance and Financial Assurance to fully address the anticipated costs of Remediation, including the estimated remaining cost for this project (below).

If this information has been provided on a Form 27 within the last 12 months, provide the Document Number of that form.

Noble intends to directly address the costs of remediation at the locations as part of our asset retirement obligation process and operations. Noble has general liability insurance (policies MWZZ316714 and MWZX316724) and financial assurance in compliance with ECMC rules. Records are available on the ECMC's website. The cost for remediation is an estimate only, costs may change upwards or downward based on site-specific information. Noble makes no representation or guarantees as to the accuracy of the estimate.

Operator anticipates the remaining cost for this project to be: \$ 50000

## WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? No

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

Volume of E&P Waste (solid) in cubic yards \_\_\_\_\_

E&P waste (solid) description \_\_\_\_\_

ECMC Disposal Facility ID #, if applicable: \_\_\_\_\_

Non-ECMC Disposal Facility: \_\_\_\_\_

Volume of E&P Waste (liquid) in barrels \_\_\_\_\_

E&P waste (liquid) description \_\_\_\_\_

ECMC Disposal Facility ID #, if applicable: \_\_\_\_\_

Non-ECMC Disposal Facility: \_\_\_\_\_

# REMEDATION COMPLETION REPORT

## REMEDATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? No

If YES:

- Compliant with Rule 913.h.(1).
- Compliant with Rule 913.h.(2).
- Compliant with Rule 913.h.(3).

Do all soils meet Table 915-1 standards? \_\_\_\_\_

Does the previous reply indicate consideration of background concentrations? \_\_\_\_\_

Does Groundwater meet Table 915-1 standards? \_\_\_\_\_

Is additional groundwater monitoring to be conducted? \_\_\_\_\_

Operator shall comply with the ECMC 1000-Series Reclamation Requirements for all impacted and disturbed areas.

## RECLAMATION PLAN

### RECLAMATION PLANNING

Describe reclamation plan. Discuss existing and new grade recontouring; method and testing of compaction alleviation; and reseeding program, including location of new seed, seed mix and noxious weed prevention. Attach diagram or drawing.

Reclamation will be in accordance with ECMC 1000 Series Rules.

Is the described reclamation complete? Yes \_\_\_\_\_

Does the reclamation described herein constitute interim or final reclamation of the Oil and Gas Location?

Interim  Final

Did the Surface Owner provide the seed mix? \_\_\_\_\_

If YES, does the seed mix comply with local soil conservation district recommendations? \_\_\_\_\_

Did the local soil conservation district provide the seed mix? \_\_\_\_\_

### SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 12/11/2024

Proposed date of completion of Reclamation. 04/14/2027

## IMPLEMENTATION SCHEDULE

Per Rule 913.d.(2): Any change from the approved implementation schedule will be requested at least 14 days in advance, and the Operator may not make the change without the Director's approval.

### PRIOR DATES

Date of Surface Owner notification/consultation, if required. 05/09/2024

Actual Spill or Release date, or date of discovery. 02/10/2025

### SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 12/11/2024

Proposed site investigation commencement. 04/13/2026

Proposed completion of site investigation. 06/22/2026

### REMEDIAL ACTION DATES

Proposed start date of Remediation. 04/23/2026

Proposed date of completion of Remediation. 10/23/2026

Per Rule 913.d.(2): Any change from the approved implementation schedule will be requested at least 14 days in advance, and the Operator may not make the change without the Director's approval.

Change from approved implementation schedule per Rule 913.d.(2).

Basis for change in implementation schedule:

The implementation schedule has been changed due to the completion of the 2Q26 site investigation at the Dillard-USX AB-67N64W 3SWSW Facility. The site investigation was completed on 04/13/26, and the corresponding analytical report was received on 04/24/26. The implementation schedule has been changed to provide an additional quarter to summarize the analytical results and propose additional site actions, as necessary. The ECMC will be notified of any updates to the implementation schedule in a subsequent Form 27.

**OPERATOR COMMENT**

This Form 27 is being resubmitted on 04/28/26 as a replacement Form 27 due to the Bulk Bypass Forms that were Returned to Draft on 04/16/26. This form also serves as a timeline update for the site investigation completed at the Dillard-USX AB-67N64W 3SWSW Facility (REM # 35676) on 04/13/26.

A site investigation was conducted on 04/13/26 to recollect soil samples analyzed outside of allotted holding times due to delays at Summit Scientific Laboratory. A total of 8 soil samples were collected and submitted for all Table 915-1 contaminants. The laboratory COC for the sampling completed on 04/13/26 has been included as an attachment on this Form. The corresponding laboratory analytical report was received on 04/24/26; Operator is requesting an additional quarter to summarize the analytical results and propose additional site actions, as necessary. The 2Q26 site investigation will be summarized in the subsequent Form 27, and the ECMC will be updated with any changes to the implementation schedule.

Per ECMC Rule 913.e., quarterly reporting will be conducted until closure criteria are achieved for the remediation project.

I hereby certify all statements made in this form are to the best of my knowledge true, correct, and complete.

Signed: Lo Blanchard

Title: Reg. Reporting Analyst

Submit Date: 03/24/2026

Email: tas-chevron-5@tasman-geo.com

Based on the information provided herein, this Application for Site Investigation and Remediation Workplan complies with ECMC Rules and applicable orders and is hereby approved.

ECMC Approved: RICK ALLISON

Date: 04/29/2026

Remediation Project Number: 35676

**COA Type****Description**

0 COA	
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**ATTACHMENT LIST**

Upon approval, the approved Form 27 and all listed attachments will be indexed to the Remediation Project file. Only the approved Form 27 will also be indexed to the related Facilities.

**Att Doc Num****Name**

404588642	INVESTIGATION/REMEDATION WORKPLAN (SUPPLEMENTAL)
404637737	CORRESPONDENCE
404638506	FORM 27-SUPPLEMENTAL-SUBMITTED

Total Attach: 3 Files

**General Comments****User Group****Comment****Comment Date**

		Stamp Upon Approval
--	--	---------------------

Total: 0 comment(s)